

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

MARK and COLLEEN HOFFMAN,

Plaintiffs,

vs.

MEDTRONIC, INC., a Minnesota
corporation; MEDTRONIC SOFAMOR
DANEK, USA, INC.;

Defendants.

Hon Jerome B. Simandle, Chief Judge

Magistrate J. Ann Marie Donio

Civil Case No. 1:13-cv-06351-JBS-AMD

**MOTION TO PERMIT APPEARANCE *PRO*
*HAC VICE***

Comes now, Daniel R. Leathers ("Movant"), an attorney licensed to practice law in the State of New Jersey, and pursuant to L.Civ.R. 101.1(c), respectfully moves that Kent L. Klaudt ("Applicant") be admitted to practice in the District Court of New Jersey, for the limited purpose of appearing as co-counsel for the plaintiff in the above styled civil action.

In support thereof, the attached Verified Application *Pro Hac Vice* is incorporated by reference as if fully set forth herein. Additionally, Movant shows the Court the following:

I.

Applicant seeks *Pro Hac Vice* admission for the limited purpose of appearing as co-counsel for the Plaintiff in the personal injury case within Civil Action No. 1:13-cv-06351-JBS-AMD.

II.

Applicant Kent L. Klaudt (California Bar No. 183903) is a member of good standing of the Bar and admitted to practice in the state of California, and is able to

practice in the Northern, Eastern, and Central District Courts of California; the Eastern District Court of Wisconsin; the District Court of Colorado; and the California Supreme Court, as described in the attached Verified Application to Appear *Pro Hac Vice*. He is not currently and has never been suspended or disbarred from the practice of law in any court and there are presently no disciplinary proceedings pending against him in any state.

III.

The address and telephone number of the registration/disciplinary agency of the above named Court is as follows:

The California Bar
180 Howard Street
San Francisco, CA 94105
Phone: (888) 800-3400

IV.

I agree to serve as responsible co-counsel on behalf of the plaintiffs for Applicant in the above referenced matter.

V.

Movant knows of no reason why Applicant should not be permitted to this Court *Pro Hac Vice* for the limited purpose of appearing as co-counsel for the plaintiff in this case now pending in this Court and included within Civil Action No. 1:13-cv-06351-JBS-AMD.

VI.

Should this motion be granted, Movant and Applicant agree to abide by all relevant rules.

WHEREFORE, Movant respectfully requests that Applicant be admitted to practice before this Court *Pro Hac Vice* for the limited purpose of appearing as co-counsel for plaintiff in this case now pending in this Court and included within Civil Action No. 1:13-cv-06351-JBS-AMD.

A handwritten signature in black ink, appearing to read 'D. Leathers', written over a horizontal line.

DANIEL R. LEATHERS, ESQUIRE

Dated: December 16, 2013

CERTIFICATE OF SERVICE

I hereby certify that the annexed Notice of Motion and Order for Admission *Pro Hac Vice*, and Certification of Kent L. Klaudt, Esq. in Support of Notice of Motion and Order for Admission *Pro Hac Vice*, have been filed via ECF System. A true and correct copy of the moving papers have been forwarded via U.S. Mail to:

Melissa A. Chuderewicz
PEPPER HAMILTON, LLP
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Daniel R. Leathers (NJ State Bar No. 1044-2009)
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Dated: December 16, 2013